

REMARKS

Claims 1-5 and 7-23 are presently pending, of which claims 1, 12 and 23 are independent. Claims 1, 12 and 23 have been amended. Support for the amendments to claim one can be found at least at page 5, lines 9-10. Support for the amendments to claim 12 can be found at least at page 1, lines 14-16 and page 4, lines 3-4. Support for amendments to claim 23 can be found at least at page 1, lines 14-22 and page 5, line 20 – page 6, line 2. No new matter has been added. Applicant believes that the claims are patentable and in condition for allowance as discussed below. Applicant respectfully requests reconsideration of the outstanding rejections in view of the comments set forth below.

I. Claim Rejections

Claims 1-5 and 7-11 have been rejected under 35 U.S.C. § 101 for being directed to non-statutory subject matter.

Claims 1-5 and 7-23 have been rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent Number 6,957,191 to Belcsak et al (hereafter “Belcsak”) in view of U.S. Patent Number 7,015,911 to Shaughnessy et al (hereafter “Shaughnessy”).

II. Claim Rejections under 35 U.S.C. §101

Claims 1-5 and 7-11 have been rejected under 35 U.S.C. § 101 for being directed to non-statutory subject matter. *See* Office Action, page 2, § 3.

The Examiner indicates that claims 1-5 and 7-11 reflect process claims but a process must (1) be tied to another statutory class (such as a particular apparatus) or (2) transform the underlying subject matter to a different state or thing *In re Bilski*. *See* Office Action, page 2, § 3.

Applicant amends claim 1 to recite “a computer-implemented method.” Claim 1 is further amended to recite that the method steps performing, producing, associating [...] tags with one or more graphical objects, associating [...] tags [...] with portions of the produced report, receiving and displaying are performed “using the computer.” Claim 1 is also amended to recite “displaying elements of the report corresponding to the selected graphical object in response to the selection on a display device.” Amended claim 1 recites a process tied to particular machine,

e.g. a computer and a display device. Accordingly, Applicant believes that the amendments address the Examiner's concerns. Claims 2-5 and 7-11 depend from claim 1 and, as such, incorporate each and every element of claim 1.

Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 1-5 and 7-11 under 35 U.S.C. § 101.

III. Claim Rejections under 35 U.S.C. §103(a)

Claims 1-5 and 7-23 have been rejected under 35 U.S.C. §103(a) as being obvious over Belcsak in view of Shaughnessy. *See* Office Action, page 3, § 5. Applicant respectfully traverses the rejection.

A. Claim 1

Claim 1, as amended, recites:

A computer-implemented method comprising:

- performing, using the computer, an analysis or synthesis operation on a graphical model representation, the graphical representation includes at least one graphical object;

- producing, using the computer, a report from the analysis or synthesis operation;

- associating, using the computer, one or more tags with one or more graphical objects of the graphical model representation while producing the report;**

- associating, using the computer, the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object while producing the report;**

- receiving, using the computer, a selection of a graphical object in the graphical model representation; and

- displaying, using the computer, elements of the report corresponding to the selected graphical object in response to the selection on a display device

Belcsak and Shaughnessy, alone or in any reasonable combination, do not disclose or suggest **associating, using the computer, one or more tags with one or more graphical objects of the graphical model representation while producing the report** and **associating, using the computer, the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object while producing the report**, as recited in Applicant's claim 1.

The Examiner admits that Belcsak does not expressly teach *associating one or more tags with a graphical object of the graphical model representation and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object*. See Office Action, page 4. Applicant agrees. The Examiner then relies on Shaughnessy for teaching these claim elements. See Office Action, page 5. Applicant respectfully disagrees.

Applicant amended claim 1 to further recite that the tags are associated with the graphical objects and with corresponding portions of the generated report **while producing the report**. Shaughnessy is silent about at least this feature of claim 1.

Shaughnessy discusses collecting data from a plurality of data sources and graphically presenting the data to the user. See Col. 1, lines 36-43. The data may be collected from a relational database management system, statistical data models and data sets, such as those used within a statistical package. See Col. 2, lines 31-36. A report is generated using the data gathered from the plurality of resources. A view specification indicates how the data is to be visually represented within the report. See Col. 1, lines 37-43. A data structure, such as the data structure 100 illustrated in Figures 5A-5C, is used to create a report, such as the report 200 illustrated in Figure 6. See Col. 3, lines 39-43. The data structure is shown in XML format to permit tags to show how one data item relates to another data item *in the XML hierarchy*. See Col. 3, lines 44-48. The report is then generated based upon the data structure. See Col. 4, lines 12-13.

Applicant respectfully submits that Shaughnessy fails to teach or suggest associating tags with a graphical object and with a corresponding portion of generated report. Shaughnessy merely uses the tags to establish a hierarchy within the data structure. Shaughnessy indicates that the highest level in the XML hierarchy is the Report tag. The different specifications needed to generate the report occupy the next level in the XML hierarchy. See Col. 3, lines 48-51. Shaughnessy is silent about associating tags with a graphical object and associating the same tags with corresponding portions of the generated report. In contrast, Applicant's claim 1 recites **associating, using the computer, one or more tags with one or more graphical objects of the graphical model representation and associating, using the computer, the one or more tags associated with a graphical object with portions of the produced report**

corresponding to the graphical object. Shaughnessy, alone or in any reasonable combination with Belcsak, does not teach or suggest these claim elements.

Shaughnessy, alone or in any reasonable combination with Belcsak, further fails to teach or suggest that the tags are associated with graphical objects and with corresponding portions of the generated report **while producing the report**. Shaughnessy recites a data source that will be used in generation of the report. *See* Col. 1, lines 35-41. A data structure dictates what data sources are involved in creating a report and how the data should appear in the report. *See* Col. 2, lines 29-32. The data structure is provided in XML format, i.e. the data structure itself contains tags. *See* Col. 3, lines 44-48. Shaughnessy indicates that the report is generated *based upon* the data structure. *See* Col. 4, lines 12-13. Therefore, in Shaughnessy, first the data structure is generated in XML format. The tags are generated within the data structure. Then, the report is generated *after* generating the data structure because the report is generated *based upon* the data structure. Shaughnessy, alone or in any reasonable combination with Belcsak, does not teach or suggest **associating, using the computer, one or more tags with one or more graphical objects of the graphical model representation while producing the report and associating, using the computer, the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object while producing the report**, as recited in Applicant's claim 1.

Accordingly, for at least the reasons presented above, Belcsak and Shaughnessy, alone or in any reasonable combination, do not disclose or suggest each and every element of claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 under 35 U.S.C. § 103(a).

B. Claims 2-5 and 7-11

Claims 2-5 and 7-11 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-5 and 7-11 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 2-5 and 7-11 under 35 U.S.C. § 103(a).

C. Claims 12-22

Claim 12 recites:

A system comprising:

means for generating code for a simulatable graphical model representation including a plurality of graphical objects;
means for performing an analysis or synthesis operation on the simulatable graphical model representation;
means for producing a report from the analysis or synthesis operation, **the report is separate and distinct from the generated code;**
means for associating one or more tags with one or more graphical objects of the simulatable graphical model representation;
means for associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object;
means for referencing the one or more graphical objects of the simulatable graphical model representation with the one or more associated tags in the generated code;
means for receiving a selection of a graphical object in the simulatable graphical model representation; and
means for displaying elements of the report corresponding to the selected graphical object in response to the selection.

Applicant respectfully submits that Belcsak and Shaughnessy, alone or in any reasonable combination, fail to disclose or suggest **generating code for a simulatable graphical model representation including a plurality of graphical objects; the report is separate and distinct from the generated code and referencing the one or more graphical objects of the simulatable graphical model representation with the one or more associated tags in the generated code**, as recited in Applicant's claim 12.

The Examiner asserts that Belcsak teaches code generated in a report in Figure 21. *See* Office Action, page 6. However, Belcsak indicates that Figure 21 merely illustrates a list of constraints that must be satisfied to solve the mathematical linear problems. *See* Col. 14, lines 37-45 and Col. 24, lines 59-65. Furthermore, according to the Examiner's interpretation, Belcsak provides code as a part of the generated report. In contrast, Applicant's claim 12 recites that **the report is separate and distinct from the generated code**. Belcsak is silent about **generating code for a simulatable graphical model representation including a plurality of graphical objects** and a report that is **separate and distinct from the generated code**.

Belcsak further fails to teach or suggest **referencing the one or more graphical objects of the simulatable graphical model representation with the one or more associated tags in the generated code**. As recited in claim 12, the one or more tags are associated with the one or more graphical objects. The same tags are associated with portions of the produced report corresponding to the graphical objects. The same tags are also used in the generated code to reference the one or more graphical objects. Therefore, the corresponding portions of the generated code, the simulatable graphical model and the produced report are associated. Belcsak is silent about a three-way association such as one provided in Applicant's claim 1. Shaughnessy fails at curing the shortcomings of Belcsak with respect to at least these features.

Shaughnessy is silent about **generating code for a simulatable graphical model representation including a plurality of graphical objects; the report is separate and distinct from the generated code and referencing the one or more graphical objects of the simulatable graphical model representation with the one or more associated tags in the generated code**. Shaughnessy merely concerns providing a graphical representation of data gathered from various databases. Shaughnessy does not concern simulatable graphical models or code generation for simulatable graphical models. Shaughnessy, alone or in any reasonable combination with Belcsak, does not disclose or suggest **generating code for a simulatable graphical model representation including a plurality of graphical objects; the report is separate and distinct from the generated code and referencing the one or more graphical objects of the simulatable graphical model representation with the one or more associated tags in the generated code**, as recited in Applicant's claim 12.

Claims 13-22 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-22 are allowable for at least the reasons set forth above with respect to claim 12. Applicant respectfully request the Examiner to reconsider and withdraw the rejection of claims 12-22 under 35 U.S.C. § 103(a).

D. Claim 23

Claim 23 recites:

A computer program product residing on a computer readable medium having instructions stored thereon which, when executed a processor, cause the processor to:

provide a simulatable graphical model including a plurality of graphical objects;

generate code for the simulatable graphical model during a simulation of the simulatable graphical model;

perform an analysis or synthesis operation on the simulatable graphical model representation;

produce a report from the analysis or synthesis operation, **the report being separate and distinct from the generated code and the report comprising information about the code generated during the simulation of the simulatable graphical model;**

associate one or more tags with the plurality of graphical objects of the simulatable graphical model representation;

associate the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object;

receive a selection of a graphical object in the graphical model representation; and

display elements of the report corresponding to the selected graphical object in response to the selection.

In light of the arguments presented above with regard to claim 12, Applicant respectfully submits that Belcsak and Shaughnessy, alone or in any reasonable combination, fail to disclose or suggest **generate code for the simulatable graphical model during a simulation of the simulatable graphical model and the report being separate and distinct from the generated code**, as recited in claim 23.

Belcsak and Shaughnessy, alone or in any reasonable combination, also fail to disclose or suggest **the report comprising information about the code generated during the simulation of the simulatable graphical model**, as further recited in claim 23. As provided above, the cited references fail to disclose or suggest *generating code for a simulatable graphical model and producing a report that is separate and distinct from the generated code*. Therefore, the cited references cannot disclose or suggest that **the report comprising information about the code generated during the simulation of the simulatable graphical model**, as recited in Applicant's claim 23.

Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 23 under 35 U.S.C. § 103(a).

CONCLUSION

In light of the above amendments and arguments, Applicant respectfully submits that all of the pending claims are in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-059RCE2. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: February 26, 2009

Respectfully submitted,

By: /Neslihan I. Doran/
Neslihan I. Doran
Registration No.: L0389
LAHIVE & COCKFIELD, LLP
One Post Office Square
Boston, Massachusetts 02109-2127
(617) 227-7400
(617) 742-4214 (Fax)
Attorney/Agent For Applicant